

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RONNIE VELA, NICHOLAS NUNEZ,
ANDY GERMUGA, TRISHA ICKES,
WILLIAM BUCKLEY, PATRICK JAMES,
WILLIAM KETTERER, THOMAS
APOSTLE, and WENDY KISER,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

AMC NETWORKS, INC.,

Defendant.

Case No. 1:23-cv-02524-ALC

**PLAINTIFFS' NOTICE OF MOTION AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs Ronnie Vela, Nicholas Nunez, Andy Germuga, Trisha Ickes, William Buckley, Patrick James, William Ketterer, Thomas Apostle, and Wendy Kiser ("Plaintiffs") will and hereby do respectfully move the Court pursuant to Fed. R. Civ. P. 23(e)(1) for an order:

- (a) Determining that the Court will likely be able to approve the proposed Settlement¹ as fair, reasonable, and adequate, pursuant to Fed. R. Civ. P. 23(e)(2);
- (b) Determining that the Court will likely be able to certify the Settlement Class, as defined in the Settlement, for purposes of judgment on the proposed Settlement pursuant to Fed. R. Civ. P. 23(a) and (b)(3);
- (c) Appointing Plaintiffs as Class Representatives of the Settlement Class;

¹ The proposed Class Action Settlement Agreement ("Settlement") is filed concurrently herewith. Unless otherwise indicated, capitalized terms herein refer to and have the same meaning as in the Settlement.

- (d) Appointing Douglas Cuthbertson, Lieff Cabraser Heimann & Bernstein LLP; Hank Bates, Carney Bates & Pulliam PLLC; Michael Reese, Reese LLP; and Kevin Laukaitis, Laukaitis Law, LLC as Class Counsel;
- (e) Approving the proposed Notice Plan set forth in the Settlement, including the proposed forms of notice, and directing that notice be disseminated pursuant to the Notice Plan and Fed. R. Civ. P. 23(e)(1);
- (f) Appointing Angeion Group LLC (“Angeion”) as Settlement Administrator and directing Angeion to carry out the duties and responsibilities of the Settlement Administrator specified in the Settlement;
- (g) Staying all non-settlement related proceedings in this lawsuit pending final approval of the Settlement;
- (h) Setting deadlines for Settlement Class Members to request exclusion from the Settlement Class and to object to the Settlement; and
- (i) Scheduling a Final Approval Hearing and certain other dates in connection with the final approval of the Settlement pursuant to Fed. R. Civ. P. 23(e)(2).

Defendant AMC Networks, Inc. does not oppose this motion. This motion is based on the accompanying memorandum of law; the Settlement and exhibits thereto; the Joint Declaration of Douglas Cuthbertson and Hank Bates filed herewith; the Declaration of Steven Weisbrot, Esq. filed herewith; the argument of counsel; all papers and records on file in this matter; and such other matters as the Court may consider.

Dated: December 11, 2023

Respectfully submitted,

/s/ Douglas I. Cuthbertson
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